

# Exhibit 98

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
(SOUTHERN DIVISION - SANTA ANA)

JANE DOE, ) CASE NO: 8:21-cv-00338-WLH-ADS  
)  
Plaintiff, ) CIVIL  
)  
vs. ) Los Angeles, California  
)  
MINDGEEK USA INCORPORATED, ) Friday, July 19, 2024  
ET AL, )  
Defendants. ) (11:18 a.m. to 11:59 a.m.)  
\_\_\_\_\_) ( 1:32 p.m. to 2:33 p.m.)

HEARING RE:

DEFENDANTS MINDGEEK USA INC, MINDGEEK S.A.R.L.,  
MG FREESITES II LTD, AND MG CONTENT RT LIMITED'S  
MOTION FOR SUMMARY JUDGMENT [DKT.NO.282];

DEFENDANTS MINDGEEK USA INC, MINDGEEK S.A.R.L.,  
MG FREESITES LTD, MG FREESITES II LTD, 9219-1568 QUEBEC INC,  
AND MG CONTENT RT LTD'S MOTION FOR SUMMARY JUDGMENT  
[DKT.NO.283];

PLAINTIFF JANE DOE'S MOTION FOR PARTIAL SUMMARY JUDGMENT  
[DKT.NO.291];

STATUS CONFERENCE

BEFORE THE HONORABLE WESLEY L. HSU,  
UNITED STATES DISTRICT JUDGE

APPEARANCES:

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Court Reporter: Recorded; CourtSmart

Courtroom Deputy: Holidae Crawford

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**APPEARANCES:**

**For Plaintiff:**

KRYSTA K. PACHMAN, ESQ.  
DAVIDA P. BROOK, ESQ.  
HALLEY W. JOSEPHS, ESQ.  
ROHIT D. NATH, ESQ.  
Susman Godfrey  
1900 Avenue of the Stars, Suite 1400  
Los Angeles, CA 90067  
310-789-3100

**For Defendants:**

SEAN TAHERI, ESQ.  
DIANE CAFFERATA, ESQ.  
MICHAEL E. WILLIAMS, ESQ.  
DILLON BONFIGLI, ESQ.  
Quinn Emanuel Urquhart & Sullivan  
865 S. Figueroa St., 10th Flr.  
Los Angeles, CA 90017  
213-443-3000

1 that everybody knows that. The customers know that, MindGeek  
2 knows that. Just assume that for the sake of argument.

3 The fact that MindGeek creates a category that is the  
4 code word for CSAM and then users are using that category to  
5 find material on MindGeek, on MindGeek's website. Doesn't -- I  
6 mean, isn't that promotion in and of itself?

7 Because if every video in the teen category were of  
8 80-year olds, I don't think MindGeek's business model would  
9 last very long, right. So why isn't that promotion of the  
10 material again, you have to assume for the sake of argument  
11 that what their expert says is true.

12 **MR. WILLIAMS:** Sure. Well, Your Honor, it's no  
13 different than the Reddit case and the Doe v Twitter case. So  
14 in Reddit and I'm looking at the Ninth Circuit decision, the  
15 plaintiff -- and Mr. Nath tried to distinguish it to say, oh,  
16 there was no promotion of CSAM in that, it was the same claim,  
17 same allegations. It says in the Ninth Circuit decision at  
18 1139, the plaintiffs allege that the presence of child  
19 pornography on Reddit is blatant but Reddit has done little to  
20 remove the unlawful content or prevent it from being posted  
21 because it drives user traffic and revenue.

22 Reddit hosted many sub-Reddits that openly and  
23 explicitly marketed themselves as fora for child pornography  
24 with names like Our Best of Young, NSFW, Are Teens Dirty, Are  
25 Teen Beauties and Are Young Girls Gone Wild.

1           Users publicly trade and solicit child pornography on  
2 these pages and advocacy groups and the press have repeatedly  
3 reported this activity to Reddit. They go on, plaintiffs  
4 allege that Reddit earns substantial advertising revenue from  
5 sub-Reddits that feature child pornography because they  
6 generate controversy and attract viewers.

7           **THE COURT:** Well --

8           **MR. WILLIAMS:** The Ninth Circuit still said, I mean,  
9 that wasn't sufficient.

10           **THE COURT:** Well but the users created the sub-  
11 Reddits, right?

12           **MR. WILLIAMS:** But they're saying Reddit hosting  
13 these sub-Reddits.

14           **THE COURT:** Well, I know, that's different. So  
15 Reddit allows users to make sub-Reddits, the sub-Reddits create  
16 these sub-Reddits with bad titles. I see that as fundamentally  
17 different than MindGeek creates a category that they know is a  
18 code word for CSAM. Why doesn't that get them past summary  
19 judgment?

20           **MR. WILLIAMS:** On which claim, Your Honor? Because  
21 that's the issue. On the trafficking claim, even if -- let's  
22 put aside Section 230, I mean, obviously we think it is fatal  
23 here. But even under the trafficking claim, they have to prove  
24 a lot more than MindGeek created a category that some people  
25 might interpret as code for CSAM. So they have to show that

CERTIFICATION

I certify that the foregoing is a correct transcript from the electronic sound recording of the proceedings in the above-entitled matter.



July 26, 2024

Signed

Dated

*TONI HUDSON, TRANSCRIBER*